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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA                                 :         **CRIMINAL COMPLAINT**  
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  :         :  
  :         Mag. No. 12-3566 (MF)  
ROLAND M. SARTORI   :

I, Ryan Alexander, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From in or about November 9, 2011 through in or about February 16, 2012, in Hudson County, in the District of New Jersey, and elsewhere, defendant ROLAND M. SARTORI did:

knowingly and intentionally conspire and agree to distribute, dispense, and possess with intent to distribute and dispense oxycodone, a Schedule II controlled substance, not for a legitimate medical purpose and beyond the bounds of medical practice, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), in violation of Title 21, United States Code, Section 846.

I further state that I am a Special Agent with the U.S. Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

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Ryan Alexander  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
February 17, 2012, at Newark, New Jersey

HONORABLE MARK FALK  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## ATTACHMENT A

I, Ryan Alexander, a Special Agent with the U.S. Federal Bureau of Investigation, following an investigation and discussions with other law enforcement officers, have knowledge of the following facts:

1. On or about November 6, 2011, a cooperating witness ("CW") met with an unnamed co-conspirator ("Co-Conspirator") at a location in Middlesex County, New Jersey. At that time, Co-Conspirator informed the CW, in substance and in part, that Co-Conspirator would sell the CW prescriptions for oxycodone; Co-Conspirator obtained the program and special printer required to print the prescriptions from a friend; Co-Conspirator has approximately 400 doctors and a couple of different telephone numbers to print on the scripts; and Co-Conspirator has people answering the telephones to act as if they work at the doctors' offices in the event a pharmacy calls to confirm a prescription. Further, Co-Conspirator told the CW that if the CW wanted prescriptions that the CW only had to provide Co-Conspirator with names and that Co-Conspirator could get the prescriptions done the same day.

2. Subsequently, through a series of text messages, Co-Conspirator agreed to sell the CW fifteen fraudulent prescriptions for oxycodone for \$300 per prescription. The CW provided Co-Conspirator with fifteen fictitious names, addresses, and dates of birth, as directed by FBI agents.

3. On or about November 9, 2011, Co-Conspirator and the CW met at a location in Union County, New Jersey. At that meeting which was observed by FBI agents, Co-Conspirator provided the CW with fifteen fraudulent prescriptions in the names of the fictitious patients that the CW provided to Co-Conspirator previously, each for 120, 30 mg pills of oxycodone, in exchange for \$4,500.

4. Similarly, on or about December 7, 2011, at the direction of FBI agents, the CW purchased ten fraudulent prescriptions, each for 120, 30 mg pills of oxycodone, from Co-Conspirator for \$3,000. The fraudulent prescriptions were all purportedly written in the name of Doctor D.G. to fictitious patients with names, addresses, and dates of birth provided by the CW to Co-Conspirator, as the CW was directed to do by FBI agents ("D.G. Prescriptions").

5. On or about December 15, 2011, two undercover telephone calls were placed to the telephone number printed on the D.G. Prescriptions. The first telephone call was answered by a voicemail greeting stating that the caller had reached the office of Doctor J.H., Rheumatology and Orthopaedics. The second telephone call was answered by a female who claimed to be working for Doctor D.G. The female proceeded to verify the D.G. Prescriptions.

6. On or about December 29, 2011, at the direction of FBI agents, the CW purchased five fraudulent prescriptions from Co-Conspirator, each for 120, 30 mg pills of oxycodone, for \$1,500. That morning, FBI agents observed Co-Conspirator meet with the CW in Nassau

County, New York. During this morning meeting, the CW provided Co-Conspirator with five fictitious names, dates of birth, and addresses for Co-Conspirator to make the fraudulent oxycodone prescriptions. After the morning meeting, FBI agents continued to conduct surveillance of Co-Conspirator.

7. Approximately one hour after the morning meeting with the CW, FBI agents observed Co-Conspirator arrive at the residence of ROLAND M. SARTORI (“SARTORI”), located in Nassau County, New York (“Residence”). SARTORI greeted Co-Conspirator at the door and FBI agents observed Co-Conspirator enter the Residence and depart the Residence approximately twenty minutes later. From the Residence, Co-Conspirator proceeded directly to meet with the CW. At this afternoon meeting, Co-Conspirator provided the CW with the five fraudulent oxycodone prescriptions in the names of the five fictitious patients that the CW provided to Co-Conspirator at the morning meeting, in exchange for \$1,500.

8. After the CW informed Co-Conspirator that there was a mistake in the identification numbers on the prescriptions, Co-Conspirator agreed to replace the prescriptions. On or about January 7, 2012, Co-Conspirator arranged for another unnamed co-conspirator to meet with the CW to provide the CW with five replacement prescriptions, each for 120, 30 mg pills of oxycodone. This meeting, which occurred in Hudson County, New Jersey, was observed by FBI agents.

9. The New York State Bureau of Narcotics Enforcement has confirmed that all of the fraudulent oxycodone prescriptions obtained from Co-Conspirator through sales conducted by the CW from November 9, 2011 through January 7, 2012, were printed on official New York State prescription paper which was assigned to a medical facility in New York for official hospital use.

10. On or about February 9, 2012, at the direction of FBI agents, the CW purchased ten fraudulent prescriptions from Co-Conspirator, each for 120, 30 mg pills of oxycodone, for \$3,000. At approximately 3:31 p.m., FBI agents observed Co-Conspirator meet with the CW at a location in Queens County, New York. During this meeting, the CW provided Co-Conspirator with ten fictitious names, dates of birth, and addresses for Co-Conspirator to make the fraudulent oxycodone prescriptions. After the meeting, FBI agents continued to conduct surveillance of Co-Conspirator. At approximately 4:19 p.m., FBI agents observed Co-Conspirator and SARTORI meet outside of the Residence and enter the Residence together.

11. Approximately eighteen minutes later, Co-Conspirator left the Residence, entered a rental vehicle driven by an unidentified male, and proceeded to meet the CW at the same location they met at approximately an hour earlier, in Queens County, New York. FBI agents observed Co-Conspirator meet with the CW and provide the CW with ten fraudulent oxycodone prescriptions in the names of the ten fictitious individuals that the CW provided to Co-Conspirator earlier in the day, in exchange for \$3,000.

12. On or about February 16, 2012, at the direction of FBI agents, the CW met with Co-Conspirator to purchase twenty fraudulent prescriptions, each for 120, 30 mg pills of oxycodone, for \$6,000. FBI agents observed Co-Conspirator enter the CW's vehicle and the CW drive to Nassau County, New York. When the CW's vehicle was approximately one block away from the Residence, FBI agents observed Co-Conspirator exit the CW's vehicle and proceed on foot to the Residence.

13. When Co-Conspirator arrived at the Residence, FBI agents observed Co-Conspirator enter the Residence. Approximately twenty-five minutes later, FBI agents observed Co-Conspirator outside of the rear of the Residence. At this time, FBI agents arrested Co-Conspirator pursuant to a previously authorized arrest warrant. Upon his arrest, Co-Conspirator was found to be in possession of, among other things, twenty fraudulent prescriptions in the names of the fictitious patients that the CW provided to Co-Conspirator earlier, and a key, which was later determined to be for a specialized prescription printer.

14. Concurrent with the arrest of Co-Conspirator, FBI agents executed a search warrant on the Residence. SARTORI was found alone in the Residence. Pursuant to the search, FBI agents found, among other things, a specialized printer for printing prescriptions ("Printer") and partial rolls of authentic prescription paper. The first blank prescription in the roll of authentic prescription paper found in the Printer contained the next consecutive serial number after the fraudulent oxycodone prescriptions which were found on Co-Conspirator and ordered by the CW.

15. All of the fraudulent oxycodone prescriptions were printed on authentic prescription paper, which is issued to licensed medical practitioners in rolls of 500 prescriptions, and therefore requires the use of a specialized printer. Each of the fraudulent oxycodone prescriptions were purportedly written by a prescribing doctor—with a license number, DEA number, NPI number, address, and telephone number—to a "patient," a fictitious individual with a date of birth and address provided to Co-Conspirator by the CW. On several occasions, FBI agents posing as pharmacists calling to confirm a prescription, have telephoned the telephone numbers printed on the fraudulent oxycodone prescriptions. In this manner, approximately six fraudulent oxycodone prescription were verified by individuals answering the telephones and purporting to work for the prescribing doctors.

16. The investigation has revealed that SARTORI is a registered physician assistant in the State of New York. Further, the investigation has confirmed that other prescriptions matching the fraudulent prescriptions sold by Co-Conspirator to the CW discussed herein have been filled by several various pharmacies in New Jersey.